

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEXANDER STYLLER, INTEGRATED COMMUNICATIONS & TECHNOLOGIES INC., JADE CHENG, JASON YUYI, CATHY YU, CAROLINE MARAFAO CHENG, PUSHUN CHENG, CHANGZHEN NI, JUNFANG YU, MEIXIANG CHENG, FANGSHOU YU, AND CHANGHUA NI

Plaintiffs,

v.

HEWLETT-PACKARD FINANCIAL SERVICES COMPANY, HEWLETT-PACKARD FINANCIAL SERVICES (INDIA) PRIVATE LIMITED, HP INC., HEWLETT PACKARD ENTERPRISE COMPANY, AND DAVID GILL,

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

DECLARATION OF LUKE NIKAS IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO SUPPLEMENT EXPERT DISCLOSURE

I, Luke Nikas, Esq., a member of the New York State Bar admitted *pro hac vice* to the Bar of this Court, declare as follows

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP. I, along with my colleagues, represent Plaintiffs in the above-captioned litigation. I submit this declaration in support of Plaintiffs' Motion for Leave to Supplement the Expert Disclosure of Alexander S. Bardey pursuant to Federal Rule of Civil Procedure 16(b)(4).
2. Attached hereto as Exhibit A is a slip sheeted Medical Expert Report of Alexander S. Bardey and all accompanying exhibits, pending Plaintiffs' assented to Motion to Impound, dated February 15, 2021.

3. Attached hereto as Exhibit B is a true and correct copy of an excerpt from Jade Cheng's deposition transcript, dated January 29, 2021.
4. Attached hereto as Exhibit C is a true and correct copy of an e-mail from Esquire Solutions to Plaintiffs' counsel transmitting the files from Jade Cheng's January 29, 2021 deposition, dated February 2, 2021.
5. Attached hereto as Exhibit D is a true and correct copy of an e-mail from Esquire Solutions to Plaintiffs' counsel transmitting the files from Caroline Cheng's January 28, 2021 deposition, dated February 1, 2021.
6. Attached hereto as Exhibit E is a true and correct copy of an e-mail from Sharon Zeman of Esquire Solutions to Plaintiffs' counsel, dated February 12, 2021.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 15, 2021

Respectfully submitted,

/s/ Luke Nikas

Luke Nikas
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Counsel to Plaintiffs

CERTIFICATE OF SERVICE

I, Luke Nikas, hereby certify that on February 15, 2021, I caused a copy of the Declaration in Support of Plaintiffs' Motion for Leave to Supplement Expert Disclosures to be served by ECF upon Defendants' counsel of record.

/s/ Luke Nikas

Luke Nikas